

U.S. Department of Justice

United States Attorney Eastern District of New York

PWB F. #2014R01413

271 Cadman Plaza East Brooklyn, New York 11201

March 16, 2016

By ECF

Honorable William F. Kuntz United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Juraboev, et al.

Criminal Docket No. 15-95 (WFK)

Dear Judge Kuntz:

The government respectfully submits this letter to update the Court on the status of classified discovery in the above-captioned matter. On February 18, 2016, the government made available to defense counsel a production of classified materials in electronic format, the substance of which the parties had discussed with the Court at the February 11, 2016 status conference. Due to technical complications, defense counsel have, to date, been unable to access these materials. The government has been working diligently to address the situation, and it is expected that defense counsel will have the ability to access the materials in question later this week.

Respectfully submitted,

ROBERT L. CAPERS United States Attorney

By: /s/ Peter Baldwin

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cc: Defense counsel (by email)